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December 30, 2015

VIA ECF AND HAND DELIVERY

The Honorable Richard Berman
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

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Re: *Wang, et al. v. China Finance Online Co. Ltd., et al.*, 15-cv-7894-RMB (S.D.N.Y.)

Dear Judge Berman:

Defendant China Finance Online Co. Limited (“CFO”) submits this letter respectfully requesting, pursuant to the Court’s Individual Practice I.D., an extension of time by which CFO must respond to Lead Plaintiffs’ Amended Consolidated Class Action Complaint (“Amended Complaint”).

Pursuant to a stipulation of the parties filed with and granted by the Court on November 2, 2015 (Dkt. # 48) (the “Stipulation”), CFO’s response to Lead Plaintiffs’ original consolidated complaint (filed on October 27, 2015) is due on January 6, 2016. At the November 23, 2015 status conference, the Court gave Lead Plaintiffs permission to file the Amended Complaint, which Lead Plaintiffs filed on December 24, 2015, and then refiled (to resolve filing deficiencies as pointed out by the Court) on December 28, 2015.

CFO respectfully requests (pursuant to the Court’s Individual Practice I.D.) that the date by which it must respond to the Amended Complaint be January 27, 2016. CFO further requests that the dates by which Lead Plaintiffs’ opposition and CFO’s reply remain as set out in the Stipulation.¹

¹ Under the Stipulation, Lead Plaintiffs’ opposition to the motion to dismiss will be due 60 days after CFO files its motion, and CFO’s reply will be due 30 days later.

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CFO intends to respond to Lead Plaintiffs' Amended Complaint by filing a motion to dismiss. In making this request for an extension of time, CFO has taken into account the Court's Individual Practice 2.A. Extending CFO's response date to January 27, 2016 should allow the parties ample time to comply with the Court's pre-motion practice as set out in that Individual Practice.²

CFO has not requested any extension to respond to the Amended Complaint (or, other than pursuant to the Stipulation – which related to the October 27, 2015 consolidated complaint – to any other iterations of Lead Plaintiffs' complaint). Lead Plaintiffs do not oppose CFO's request to extend its deadline to respond to the Amended Complaint to January 27, 2016.

* * * *

For the reasons set out above, CFO respectfully requests that the Court grant CFO's request for an extension of time to respond to the Amended Complaint to January 27, 2016.

Respectfully submitted,

/s/ Ralph C. Ferrara

Ralph C. Ferrara

cc: All counsel of record (by ECF)

SO ORDERED:

Date: 12/30/15

Richard M. Berman

Richard M. Berman, U.S.D.J.

² CFO intends to file a letter requesting a pre-motion conference with the Court to consider CFO's proposed motion to dismiss the Amended Complaint by January 11, 2016.